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*Attorneys for Defendants
Irico Group Corp. and
Irico Display Devices Co., Ltd.*

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION,

) Master File No. 07-cv-05944-JST

) MDL No.: 1917

THIS DOCUMENT RELATES TO:

ALL DIRECT PURCHASER ACTIONS

ALL INDIRECT PURCHASER ACTIONS

) **SECOND DECLARATION OF
ZHANG WENKAI IN SUPPORT OF
DEFENDANTS IRICO GROUP
CORP. AND IRICO DISPLAY
DEVICES CO., LTD.'S
EMERGENCY MOTION FOR
RELIEF FROM SCHEDULING
ORDER (CIV. L.R. 16-2(d))**

1 I, Zhang Wenkai, declare as follows:

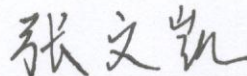
2 1. I am a citizen of the People's Republic of China and reside in Shaanxi Province,
3 People's Republic of China.

4 2. I make this second declaration in support of the Motion for Relief from
5 Scheduling Order filed by Irigo Group Corp. ("Irigo Group") and Irigo Display Devices Co.,
6 Ltd.'s ("Irigo Display," collectively, the "Irigo Defendants").

7 3. I am currently the Deputy General Counsel for Irigo Group Corp. and have been
8 involved in the day-to-day management of this litigation since I started with the company in
9 September 2017. I have also been involved with the coordination of the depositions for Irigo
10 witnesses Wang Zhaojie and Su Xiaohua since August 2021, and the deposition of Yan
11 Yunlong since December 2021.

12 4. Although Su Xiaohua formally resigned from Irigo Foshan Flat Panel Display
13 Co., Ltd., the Irigo subsidiary who most recently employed him, on May 25, 2022, I did not
14 learn of Mr. Su's resignation until May 31, 2022.

15 Executed this 21st day of July, 2022, in Xianyang, Shaanxi Province, People's Republic
16 of China.

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18 Mr. Zhang Wenkai
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